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December 24, 2018

VIA ECF AND E-MAIL

Hon. Katherine Polk Failla  
United States District Judge  
United States District Court  
for the Southern District of New York  
40 Foley Square, Room 2103  
New York, NY 10007

Re: *HDA v. Zucker et al.*, 18-cv-06168

Dear Judge Failla:

We write on behalf of all parties in the above-referenced action pursuant to FRCP 54(d)(2) and Local Rule 54.1 for an extension of time for Plaintiff's counsel to file its motion for attorney's fees, related nontaxable expenses, and taxable expenses.

Judgment was entered in Plaintiff's favor in this matter on December 19, 2018, and an amended judgment was entered on December 21, 2018 (the "Amended Judgment"). Pursuant to Local Rule 54.1, the deadline for Plaintiff to submit a motion for attorney's fees and related nontaxable expenses is January 2, 2019, and the deadline for Plaintiff to seek taxable costs is January 18, 2019.

For reasons of judicial economy, the parties jointly request that the deadline for Plaintiff to file a motion for attorney's fees and related nontaxable expenses and to seek taxable costs be extended to the later of either twenty-one days following the last day to appeal from the Amended Judgment in this action, or if any appeal is taken, to twenty-one days following the termination of the appeal (defined as dismissal of the appeal or issuance of the Second Circuit's mandate).

Respectfully submitted,

By: /s/ Johnathan Farber  
Seth Jonathan Farber  
James M. Hershler  
NYS Office of the Attorney General

By: /s/ Andrew Kratenstein  
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